

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SONRAI SYSTEMS, LLC,)	
)	
Plaintiff,)	Case No. 1:21-CV-02575
)	
v.)	JURY TRIAL DEMANDED
)	
WASTE CONNECTIONS OF CANADA, INC.,)	Honorable John Robert Blakey
)	
Defendant.)	

JOINT STATUS REPORT

In accordance with this Court's February 28, 2023 Order (Dkt. 74), the parties submit the following Joint Status Report:

1. The Court's February 28, 2023 Order directed the parties to propose reasonable case management dates, including fact discovery and, if needed, expert discovery deadlines.
2. The parties propose the following case management schedule:
 - a. The parties shall exchange Rule 26(a)(1) disclosures by April 27, 2023.
 - b. The parties shall exchange first sets of document requests and interrogatories by May 17, 2023.
 - c. The parties shall complete substantial production of documents by October 11, 2023.
 - d. Fact discovery shall close on the later of February 13, 2024 or 60 days after the receipt of all third-party discovery. At least some of the third-party discovery is expected to be international.
 - e. The parties shall disclose experts and serve initial expert reports 30 days after the close of fact discovery.

- f. The parties shall disclose any rebuttal experts and serve rebuttal expert reports 30 days after initial expert reports are served.
- g. Expert discovery shall close 60 days after rebuttal expert reports are served.
- h. The parties propose that dispositive motions be filed 60 days after the close of expert discovery with a briefing schedule to be set by the Court.

3. If any of the above dates fall on a weekend or holiday, the due date will be the next business day pursuant to Fed. R. Civ. P. 6(a)(1).

Dated: April 7, 2023

/s/ J. Scott Humphrey

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CERTIFICATE OF SERVICE

The undersigned certifies that on April 7, 2023, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey
One of the Attorneys for Plaintiff